



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/AFM/KCB
F. #2018R01047

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 19, 2021

By Email and ECF

Samuel M. Braverman
Albert Y. Dayan
Kenneth J. Kaplan
Joel M. Stein
Geoffrey R. Kaiser
Todd D. Greenberg
John S. Wallenstein
Richard D. Willstatter

Re: United States v. Jack Cabasso, et al.
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

The government has made available a further production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This material can be obtained through the government's free online file transfer system, USAFX, or by contacting John Palermo at DupeCoop at 973-895-1359. This production supplements the disclosures of Rule 16 discovery produced to individual defendants on January 14, 2020, and November 18, 2020, and to all defendants on June 24, 2020, July 2, 2020, July 10, 2020, July 31, 2020, September 17, 2020, October 16, 2020, November 24, 2020, December 17, 2020 and February 11, 2021. The government renews its request for reciprocal discovery from the defendants.

Specifically, enclosed please find the following materials, which are subject to the protective order entered in this case on May 29, 2020:

Records	Bates Number
Microsoft Skype data obtained from Microsoft Corporation pursuant to the judicially-authorized search warrant produced to you at AVENTURA_0000080263-AVENTURA_0000080270 and AVENTURA_0000080277-AVENTURA_0000080287	AVTESI_0003744547-AVTESI_0003745869
Data obtained from the Women's Business Enterprise National Council and the Women Presidents Organization	AVTESI_0003745870-AVTESI_0003747462

The data are available as load files containing native, text and TIFF files, and in the alternative as an iPro Eclipse production. Should you obtain these files from Dupe Coop, be aware that the relevant production (in both its loadfile and Eclipse versions) is designated by Dupe Coop as Production 08.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

By: /s/
Ian C. Richardson
Alexander Mindlin
Kayla Bensing
Assistant U.S. Attorneys
(718) 254-6299/6433/6279

Enclosures

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)